

EXHIBIT

**IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF GEORGIA
COLUMBUS DIVISION**

WILHEN HILL BARRIENTOS, et al,

Plaintiffs,

v.

CORECIVIC, INC.,

Defendant.

Civil Action No. 4:18-cv-00070-CDL

Declaration of Jessica Tseng Hasen

I, Jessica Tseng Hasen, hereby declare and state as follows:

1. My name is Jessica Tseng Hasen. I am a Senior Counsel at Perkins Coie LLP in the E-Discovery Services and Strategy practice group. I represent Plaintiffs in the above-captioned litigation.

2. I have reviewed the January 28, 2021 and February 20, 2021 productions of electronically stored information (“ESI”) by Trinity Services Group, Inc. (“Trinity”). I reviewed and analyzed those document productions and the accompanying metadata produced by Trinity using the e-Discovery review, analysis, and production platform, Relativity.

3. The ESI productions included a total of 812 files. Of those files, only 149 have “Email From” values or a .eml email file-type extension. Only 112 of those files constitute unique email subjects. Therefore, Trinity has effectively produced a total of 112 unique email threads in its ESI productions to date.

4. Of the 812 files that Trinity produced, 288 are image files of Trinity’s mascot, company logo, or an emoji saying “don’t forget.”

5. Trinity likely produced those image files because they are part of responsive email families. However, such image files do not need to be reviewed and coded during an ESI review process. It is standard practice for production teams to extract those embedded images and segregate them from the review process to avoid expending resources on reviewing and producing non-substantive image files.

6. Trinity also produced 179 files that are duplicates of the same two email attachments, Trinity's employee handbook and employee handbook receipt acknowledgment form. A standard review process would have segregated those duplicates to avoid expending resources on the review of those documents as well.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 29th day of March, 2021 in Seattle, Washington.



Jessica Tseng Hasen